2012 ANNUAL AIR MONITORING NETWORK PLAN CHECKLIST

Blue = fields that would be filled in during ANP review

No.	ANP requirement	Citation within 40 CFR 58	Was the info submitted? If yes, page #s	Action if info is missing or incorrect	Does it meet the req?	Action if req. is not met (assumes correct info submitted)	Notes (for now on req. but ultimately for review notes)	Informs network adeq?	Critical for ANP app?[1]
1	July 1st due date	58.10 (a)(1)		Request plan be submitted ASAP.		ANP approval can happen within 120 days of when delinquent plan is received	shall submit	N	N
2	Specify monitors that are part of SLAMS, NCore, STN, State speciation, in serious, severe and extreme ozone nonattainment areas, PAMS, and SPM	58.10(a)(1)		Specify monitors known of that were not included and request these be included in the next applicable ANP. Request table showing all applicable		N/A		N	N

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[1] Identify critical criteria for approval. All else is WOE.
Critical is based on:
- 40 CFR 58.10 says "must include" or "shall provide"
- 40 CFR 58, App A – pick the critical ones and all else WOE
- 40 CFR 58, App C – ID as critical if requirement is "must"
- 40 CFR 58, App D – ID as critical if requirement is "must"
- 40 CFR 58, App E – none are critical since these need to be followed "to the extent possible"

Comment [e1]: I think this checklist should be year specific and get revised each year to reflect any changes occurring to the regs from the previous year.

Comment [m2]: Added year and agency to checklist

Comment [e3]: Generally speaking, I think it would be good to include an intro section to the checklist that includes clear definitions for each of the columns and instructions on how to use the checklist.

Comment [m4]: Will add instructions and definitions on cheat sheet

Comment [e5]: Suggest we number each of these checks for easy to identification purposes.

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" ar...

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of ...

Comment [m15]: If any of the critical elements in the foot note are met then the item is considere...

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in ...

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro sect...

Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [e16]: When would request go out and in what format? I would suggest start by sending ...

Comment [e17]: I would suggest this to try to encourage agencies to include a table in their AN...

Comment [m18]: I included a header to specify what monitors should be addressed in the ANP. T...

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				monitors.					
3	Statement of purpose for each monitor	58.10 (a)(1)		Add/correct in following year's plan	Yes if correct info was submitted	No impact on current year's approval	Shall include	N	N
Etc.	30-day public comment / inspection period[2]	58.10 (a)(1), 58.10 (a)(2)		Put out for comment and resubmit		EPA provide comment period	Shall/must provide	N	Y
	~~List of~~ modifications to SLAMS network	58.10 (a)(2)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted, (assumes we are not approving the changes in ANP)	N/A – req. met if correct info submitted	Subject to approval by RA	N	Y
	NCore plan submitted to Admin. by 7/1/2009	58.10 (a)(3)		Ask for plan ASAP	N/A – HQ app.	N/A – HQ app.	Shall HQ app.	N	N
	NCore site operational by 1/1/2011	58.10 (a)(3)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for … HQ app.	N	Y

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[2] Comment period required by either EPA or S/L/T agency if modifications are proposed to the SLAMS network. Otherwise an inspection period is required by the S/L/T agency.

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	Pb plan for ≥1.0 tpy sources by 7/1/2009	58.10 (a)(4)		Ask for (correct) plan ASAP and withhold approval of that portion		If the submitted plan does not meet the requirements: withhold approval of that portion	Shall	N	Y
	Pb site for ≥1.0 tpy sources operational by 1/1/2010	58.10 (a)(4)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for …	Y	Y
	Pb plan for 0.5-1.0 tpy by 7/1/2011	58.10 (a)(4)		Ask for plan ASAP		If the submitted plan does not meet the requirements: withhold approval of that portion	Shall	N	Y
	Pb site for 0.5-1.0 tpy sources operational by 12/27/2011	58.10 (a)(4)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for …	Y	Y
	NO2 plan for area-wide and RA40 sites by 7/1/2012	58.10 (a)(5)		Ask for sites to be identified in 2013 ANP.plan ASAP		2012: Withhold approval of that portion since HQ app.	Shall HQ app.	N	N

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	NO2 area-wide and RA40 sites operational by 1/1/2013	58.10 (a)(5)		Ask for confirmation of operation in 2013 ANPdd/correct in following year's plan and withhold approval of that portion.		Withhold approval of that portion	Plan shall provide for …	Y	N¥
	NO2 plan for near-road sites by 7/1/2012?	58.10 (a)(5)		Ask for plan that goes through public notice ASAP		2012: Withhold approval of that portion since HQ app.	Shall HQ app.	N	N
	NO2 near-road sites operational by ?	58.10 (a)(5)		IncludeAdd/correct in following year's ANP or separate plan when submitted-.and withhold approval of that portion		Withhold approval of that portion ?	Plan shall provide for …	Y	N¥
	SO2 plan for PWEI sites by 2011	58.10 (a)(6)		Ask for plan ASAP		If the submitted plan does not meet the requirements: withhold approval of that portion	Shall	N	Y

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	SO2 sites operational by 1/1/2013	58.10 (a)(6) and 58.13(d)		Add/correct in following year's plan and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for…	Y	Y
	CO plan for 2015 near-road sites by 7/1/2014	58.10 (a)(7) and 58.13(e)(1)		Ask for plan by 7/1/2014ASAP		If the submitted plan does not meet the requirements: withhold approval of that portionTo be determined for 7/1/2014 plan reviews.	Shall	N	NY
	CO sites operational by 1/1/2015 6	58.10 (a)(7?) and 58.13(e)(1)		Add/correctInclude in following year's ANP or separate plan when submitted.and withhold approval of that portion		Withhold approval of that portion	Plan shall provide for…	NY	NY
	CO plan for 2017 near-road sites by 7/1/2016	58.10 (a)(7) and 58.13(e)(2)		Ask for plan by 7/1/2016		To be determined for 7/1/2016 plan reviews.	?	N	N

Comment [e5]: Suggest we number each of these checks for easy to identification purposes.

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

Comment [m13]: Clarified this in the footnote.

Comment [e14]: How are the critical criteria for 40 CFR 58, App.A selected? Is there a rule of thumb?

Comment [m15]: If any of the critical elements in the foot note are met then the item is considered crticial.

Comment [m7]: Create cheat-sheet for requirement plus non-blue columns.

Comment [e8]: I am slightly confused by this. Can it be better explained in an intro section or in footnote?

Comment [m9]: I can define these in the cheat sheet.

Comment [e10]: I am slightly confused by this column. Can it be better explained in an intro section or in footnote?

Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [e35]: Again, unsure of what the notes in this column means here and for other CO check…

Comment [e36]: Change to Y for 2014 ANP.

Comment [e37]: Not critical for 2012 plans, …

Comment [e33]: Alternatively, since this is n…

Comment [e34]: When the time comes, I …

Comment [e38]: Change to Y for 2014 ANP.

Comment [e39]: Not critical for 2012 networ…

Comment [e41]: Change to Y for 2016 ANP.

Comment [e42]: Becomes critical for 2016 …

Comment [e40]: Alternatively, since this is n…

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	CO sites operational by 1/1/2017	58.10 (a)(7) and 58.13(e)(2)		Include in following year's ANP or separate plan when submitted.		Withhold approval of that portion	?	N	N
	AQS site identification number for each existing and proposed site	58.10 (b)(1)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	N	Y
	Location of each existing and proposed site: street address and geographic coordinates	58.10 (b)(2)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	N	Y
	Sampling and analysis method(s) for each measured parameter	58.10 (b)(3)		Add/correct in following year's plan and withhold approval of that portion		N/A – req. met if correct info submitted	Must contain following information	N	Y
	Operating schedule for each monitor	58.10 (b)(4)		Add/correct in following year's plan and withhold approval of that portion		If operating schedule does not meet req: withhold approval of that portion (can be monitor	Must contain following information	Y	Y

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Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [e43]: Change to Y for 2016 ANP.

Comment [e44]: Becomes critical for 2016 ANP.

Comment [g46]: Should the 58.10 stuff be combined with the App. D 1.1 stuff? (Like, all the stuff they might have in the individual site tables could be grouped together in this checklist?)

Comment [e47]: I am confused at the meaning of this for this column.

Comment [e45]: Including for consistency with CFR language.

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						specific)			
	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted, (assumes we are not approving the changes in ANP)	N/A – req. met if correct info submitted	Must contain following information	N	Y
	Monitoring objectives[3] for each monitor as defined in Appendix D	58.10(b)(6); App. D		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	N	Y
	Scale of representativeness for each monitor as defined in Appendix D			Add/correct in following year's plan and withhold approval of that portion		N/A – req. met if correct info submitted	Must contain following information	Y	Y
	Identification of sites suitable and sites not suitable for comparison to the annual PM2.5 NAAQS as described in Part 58.30	58.10 (b)(7)		Add/correct in following year's plan and withhold approval of that portion		N/A – req. met if correct info submitted	Must contain following information	Y	Y

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[3] Site type is considered later.

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Comment [m6]: Good idea.

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Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [e48]: I would think this to be a Y here. It would help to define up front what this column is speaking to.

Comment [mk49]: Monitoring objective are: 1. inform public, 2. NAAQS comp, and 3. research. We don't need to consider these to determine network adequacy unless we take 1 and 3 out of our consideration for reg. decisions.

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	MSA, CBSA, CSA or other area represented by the monitor	58.10 (b)(8)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	N	Y
	The designation of any Pb monitors as either source-oriented or non-source-oriented	58.10 (b)(9)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	Y	Y
	Any source-oriented Pb site for which a waiver has been granted by EPA RA	58.10 (b)(10)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	Y	Y
	Any Pb monitor for which a waiver has been requested or granted by EPA RA for us of Pb-PM10 in lieu of Pb-TSP	58.10 (b)(11)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must contain following information	Y	Y
	Identification of required NO2 monitors as either near-road or area-wide	58.10 (b)(12)		Add/correct in following year's ~~plan and withhold~~ ANP.		Withhold approval of that portion~~2 (HQ).~~	Must contain following information	Y	Y

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Comment [m11]: This will be more obvious when I make the cheat sheet.

Comment [e50]: Again, I can envision a Y here since several of our minimum monitoring requirements are assigned at the CBSA/MSA level.

Comment [e51]: I know this is a tricky one, but I actually do believe it would be appropriate in this case for R9 to be the one to withhold approval since this is a requirement for the ANP which goes to the RA. To me, this requirement is simply stating that the S/L agencies are required to identify the number of near-road and area-wide monitors they should be operating.

Comment [e52]: Again, confused by this column.

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				~~approval of that portion~~					
	Document how states and local agencies provide for the review of changes to a PM2.5 monitoring network that impact the location of a violating PM2.5 monitor.[4]	58.10 (c)		Add/correct in following year's plan and withhold approval of that portion	Yes if correct info was submitted	If the process for the review of changes to the PM2.5 network does not meet the req: withhold approval of that portion.	must	N	Y
	Plan to modify the network that complies with findings of the 5-year network assessment. [Note: can be submitted on year of network assessment or year after.]	58.10 (e) 58.14 (a)	Only applies to year of or after 5-year network assessment	Add/correct in following year's plan and withhold approval of that portion	Yes if plan was submitted, either with ANP or separately	If the plan would result in not meeting other requirements then withhold approval of that portion.	Shall develop and implement. Final plan subject to approval by RA.	N	N
	All additions and discontinuations of SLAMS have	58.10 (e)		Withhold approval of that portion.		If modification does not meet req: withhold		Y for some sites:	Y

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[4] The affected state or local agency must document the process for obtaining public comment and include any comments received through the public notification process within their submitted plan.

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	been subject to approval according to 58.14			Work separately with agency to obtain information needed to approve modification and approve outside ANP process. List in following year's plan.		approval of that portion.		DV, high conc, co-located, etc.	
	Data submitted to AQS	58.16		for ANP			No regulatory req. in 58.10 or App A, C, D, or E for this in ANP		
	Precision/Accuracy reports submitted to AQS	App. A		Add/correct in following year's plan.		N/A – req. met if correct info submitted	Must => WOE	N	N
	Annual data certification submitted	App. A		Add/correct in following year's plan and withhold approval of that portion.		N/A – req. met if correct info submitted	Must => WOE	Y	Y
	Frequency of flow rate	App A, 3.3.2		Add/correct in following		If frequency does not meet	Must => WOE	WOE	

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	verification for manual PM samplers audit			year's plan.		requirement then withhold approval of that portion.			
	Frequency of flow rate verification for automated PM analyzers audit	App A, 3.2.3		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE	WOE	N
	Frequency of one-point flow rate verification for Pb samplers audit	App A, 3.3.4.1		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE		
	Frequency of one-point QC check (gaseous)	App. A, 3.2.1		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE		
	Date of last Annual Performance Evaluation (gaseous)	App. A, 3.2.2		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE		
	Dates of last two semi-annual flow rate audits for	App A 3.2.4 and 3.3.3		Add/correct in following year's plan.		If frequency does not meet requirement	Must => WOE		

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	PM monitors					then withhold approval of that portion.			
	Dates of last two semi-annual flow rate audits for Pb monitors	App A 3.3.4.1		Add/correct in following year's plan.		If frequency does not meet requirement then withhold approval of that portion.	Must => WOE		
	PM2.5 co-location			Add/correct in following year's plan and withhold approval of that portion.		If co-location does not meet requirement then withhold approval of that portion.	Must => WOE	Y	Y
	PM10 co-location			Add/correct in following year's plan and withhold approval of that portion.		If co-location does not meet requirement then withhold approval of that portion.	Must => WOE	Y	Y
	Pb co-location	App. A 3.3.4.3		Add/correct in following year's plan and withhold approval of that portion.		If co-location does not meet requirement then withhold approval of that portion.	Must => WOE	Y	Y
	PM10-2.5 co-location	App. A 3.3.6		~~Add/correct in following year's plan.~~If site hosted.		~~If co-location does not meet requirement then withhold~~	Must => WOE	N	N

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Comment [m59]: Is PM10 co-location required?

Comment [e60]:

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				may request for this to be included in next applicable plan.		approval of that portion.N/A-HQ action			
	PM2.5 PEP audits	App. A (3.2.7)		Check EPA records.	EPA requirement	EPA adjusts schedule	EPA req.	Y	N
	Pb PEP audits	App. A (3.3.4.4)		Check EPA records.	EPA requirement	EPA adjusts schedule	EPA req.	Y	N
	NPAP audit	App. A (?)		Check EPA records.	EPA requirement	EPA adjusts schedule	EPA req.	Y	N
	Instrument/monitoring method code for each monitor: is it reported properly? Is it reported correctly (i.e., appropriate method code for regulatory monitors)?	App. C		Add/correct in following year's plan and withhold approval of that portion.		N/A – req. met if correct info submitted	must	Y	Y
	Optional request to have PM2.5 continuous instruments treated as non-FEMs and therefore not comparable to NAAQS?	Proposed rule and memo		Assume all FEM instruments are comparable to NAAQS (see previous item)		If the evidence to treat FEMs as non-FEMs is not compelling: withhold approval of that portion and treat all FEMs as regulatory		Y	Y if request is included

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						monitors			
	Start date for each monitor	App. C		Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must	Y – info is needed for valid DV determ. but can be obtained from AQS	Y
	Instrument monitor type for each monitor			Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	N/A – req. met if correct info submitted		Y – ID non-reg. monitors	Y
	Monitoring objective for each instrument	App. D 1.1		Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	N/A – req. met if correct info submitted	Must	N	Y
	Site type for each instrument	App. D 1.1.1		Add/correct in following year's plan and withhold approval of that portion.	Yes if correct info was submitted	N/A – req. met if correct info submitted		N	Y
	Instrument parameter code			Add/correct in following	Yes if correct info was	N/A – req. met if correct info		Y	Y

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	for each instrument			year's plan and withhold approval of that portion.	submitted	submitted			
	Instrument parameter occurrence code for each instrument			Add/correct in following year's plan.	Yes if correct info was submitted	N/A – req. met if correct info submitted		N	N
	Sampling season	App. D		Add/correct in following year's plan and withhold approval of that portion.		If sampling season does not meet requirements or a deviation has not been approved: withhold approval of that portion	must	Y	Y
	Sampling schedule for PM2.5	58.12(d)		Add/correct in following year's plan and withhold approval of that portion.		If sampling schedule does not meet requirements or a deviation has not been approved: withhold approval of that portion	must	Y	Y
	Sampling schedule for	58.12(e)		Add/correct in following		If sampling schedule does	must	Y	Y

Comment [e5]: Suggest we number each of these checks for easy to identification purposes.

Comment [m6]: Good idea.

Comment [e12]: Would a plan be disapproved if any of these critical criteria denoted with a "Y" are not met? It would be good to include instructions up front to make this clear.

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Comment [m65]: Needed for PM2.5? Maybe just change this to PM2.5 POC?

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	PM10			year's plan and withhold approval of that portion.		not meet requirements or a deviation has not been approved: withhold approval of that portion			
	Sampling schedule for Pb	58.12(b)		Add/correct in following year's plan and withhold approval of that portion.		If sampling schedule does not meet requirements or a deviation has not been approved: withhold approval of that portion	Must collect at 1:6 unless waiver	Y	Y
	Sampling schedule for PM10-2.5	58.12(f)		Add/correct in following year's plan and withhold approval of that portion.		If sampling schedule does not meet requirements or a deviation has not been approved: withhold approval of that portion	Must collect at 1:6 unless waiver	N	Y
	Minimum monitoring requirements met for O3	App. D		Add/correct in following year's plan and withhold		If minimum monitoring requirements are not met:	must	Y	Y

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				approval of that portion.		withhold approval of that portion			
	Minimum monitoring requirements met for NO2	App. D		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y̶N
	Minimum monitoring requirements met for SO2	App. D section 4.4		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
	Reporting/collecting max 5 minute average per hour for SO2	58.12(g), 58.16(g)					No regulatory req. in 58.10 or App A, C, D, or E for this in ANP		
	Minimum monitoring requirements met for CO	App. D		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	N̶Y	N̶Y
	Minimum	App. D		Add/correct in		If minimum	must	Y	Y

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	monitoring requirements met for Pb, including for Pb at NCore	section 4.5; 58.13(a)		following year's plan and withhold approval of that portion.		monitoring requirements are not met: withhold approval of that portion			
	Minimum monitoring requirements met for PM2.5	App. D		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
	Minimum monitoring requirements met for PM10	App. D		Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	Y	Y
	Minimum monitoring requirements met for PM10-2.5			Add/correct in following year's plan and withhold approval of that portion.		If minimum monitoring requirements are not met: withhold approval of that portion	must	N	Y
	Distance of site from nearest road	App. E		Add/correct in following year's plan.		Suggest corrective action or document	followed to the maximum extent	N	N

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						deviation in waiver request.	possible		
	Traffic count of nearest road	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Groundcover	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Probe height	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Distance from supporting structure	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Distance from obstructions on roof	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Distance from obstructions not on roof	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent	N	N

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							possible		
	Distance from trees	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Distance to furnace or incinerator flue	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Distance between collocated monitors	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Unrestricted airflow	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Probe material (if applicable)	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N
	Residence time (if applicable)	App. E		Add/correct in following year's plan.		Suggest corrective action.	followed to the maximum extent possible	N	N

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Use a weight of evidence approach.

Based on the information that is in the Annual Network Plan, [EPA has determined that the Annual Network Plan meets the requirements listed in 40 CFR 58.10, except for …]

Comment [m70]: Use R1 language for this.

Identify action if deficient (request for next-year's plan, disapprove portion, address issue and resubmit, etc.)

Identify which have to be met for network adequacy vs. ANP approval (if there is a difference) or just which inform network adequacy.

Comment [e71]: I like that these instructions are provided, however I would like to see them in more of a step by step fashion and in more detail.